

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Janice Biagioli,

Plaintiff

v.

LVNV Funding, LLC,

Defendant

Docket No. 3:22-733

(JUDGE MALACHY E. MANNION)

FILED ELECTRONICALLY

STIPULATION TO EXTEND DEADLINES

1. Currently, the deadline for discovery in this matter is April 28, 2023.
2. The parties have been engaging in discovery, and are finalizing written discovery and preparing to conduct depositions.
3. However, due to scheduling conflicts involving counsel and the parties, it will not be possible for depositions to be completed by the current discovery deadline.
4. Counsel for the parties have conferred in good-faith, and believe that a 60-day extension of time will be sufficient for discovery to be completed.
5. Additionally, the parties believe that the deadline for dispositive motions should likewise be extended.
6. This request is not being made for any improper purpose, and is instead being made due to *bona fide* scheduling conflicts.
7. Thus, the parties request that the Court approve this stipulation and:
 - a. extend the deadline for discovery to June 30, 2023, and
 - b. extend the deadline for dispositive motions to August 31, 2023.

s/ Brett Freeman

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s/ Brendan Little (with consent)

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ORDER

So ordered.

Date: _____

Malachy E. Mannion
United States District Judge